EXHIBIT 1

Plaintiffs' More Definite Statement as to
Defendant Bank Al Jazira

1.   Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849.

Organizational Structure and Purpose of Bank Al Jazira

1.   Bank Al Jazira was founded in Saudi Arabia in 1975, the first of the foreign banking operations converted into a local joint stock entity.

2.   Bank Al Jazira facilitated money transfers to the Spanish al-Qaida cell.

3.   Chairman of Bank Al Jazira Abdel Qader Faqeeh appears on the Golden Chain List.

4.   In March 2002, Bosnian authorities conducted searches of the Sarajevo offices of Defendant Benevolence International Foundation (BIF).

5.   During these searches, authorities uncovered numerous handwritten documents detailing the origin and history of the al Qaeda organization. These documents were located on the hard drive of one of the office computers under the directory heading "Tareekhosama" or Osama's history. Among the handwritten documents located on this hard drive was a copy of a 1988 handwritten draft listing wealthy financiers of UBL's mujahideen operations in Afghanistan, referred to within al Qaida as the "Golden Chain."

6.   Jamal Al-Fadl, a former top Al-Qaeda lieutenant and BIF officer in the Sudan, was prepared to testify in *United States v. Enaam M. Arnaout*, United States District Court, Northern District of Illinois, Eastern Division, Case #02CR 892, concerning the "Golden Chain" list which included Bank Al-Jazira's Chairman's name. According to Al Fadl's statement, the

list known as the "Golden Chain" identifies the key individuals who regularly provided Osama

bin Laden with funding for transportation, communications equipment, weapons, funding,

ammunition and other material support.   Al Fadl's eyewitness testimony concerning

contributions of the Golden Chain members extends into the early to mid 1990s long after the

formation of al Qaeda.